

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

(DRAFT) Air Permit Review

Permit Issue Date:

Region: Mooresville Regional Office
County: Union
NC Facility ID: 9000159
Inspector's Name: Bill Bass
Date of Last Inspection: 12/10/2003
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)
<p>Applicant (Facility's Name): Color Ad Packaging Inc</p> <p>Facility Address: Color Ad Packaging Inc 3014 Chamber Drive Monroe, NC 28110</p> <p>SIC: 2759 / Commercial Printing, Nec NAICS: 323112 / Commercial Flexographic Printing</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>			<p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:</p>
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	<p>Application Number: 9000159.04B Date Received: 06/30/2004 Application Type: Renewal & 1st Time Title V Application Schedule: TV-Renewal/Modification Existing Permit Data Existing Permit Number: 07777/R08 Existing Permit Issue Date: 08/27/2004 Existing Permit Expiration Date: 09/30/2004</p>
Dewayne Evans Production Manager (704) 289-7076 P.O. Box 2249 Indian Trail NC, 28079	Roger Tisi General Manager (704) 289-7076 P.O. Box 2249 Indian Trail NC, 28079	Dewayne Evans Production Manager (704) 289-7076 P.O. Box 2249 Indian Trail NC, 28079	
<p>Review Engineer: Gautam Patnaik</p> <p>Review Engineer's Signature: _____ Date: 9/27/05</p>		<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 07777/T09 Permit Issue Date: Permit Expiration Date:</p>	

1. Introduction:

The facility is involved in printing and converting flexible film into bags. This involves printing/coating of plastic film utilizing flexographic printing presses.

2. Purpose of Application

This application is for the renewal of the Air Quality permit (Air Permit No. 07777R08) issued on June 10, 2004, which expired on September 30, 2004.

The 1st time title V permit (Permit No. 07777T07) for this facility was issued on April 6, 2004. As per EPA suggestion this 1st time title V had PSD avoidance conditions different from the previous permit (Addressed later). The applicant also had another application (App

9000159.04A) pending with the Division for the addition of one 10 Color PCMC Flexographic press (ID No. FP-4) to replace the existing one Bielloni-type narrow web natural gas-fired flexographic printing press (ID No. FP-3B). To circumvent the non-attainment status of the County the applicant appealed the 1st time title V permit on 4/7/2004. As a result of this appeal the applicant was issued a .0300 permit (07777R08) and the appeal was withdrawn and the facility's 1st time title V was to be issued during the renewal of their permit or significant change, whichever came earliest. The facility will now be issued their 1st time title V permit (07777T09) and the draft permit will undergo a public and EPA review.

3. Regulatory Review

The facility is subject to the following regulations:

15A NCAC 2D .0516, "Sulfur Dioxide Emissions from Combustion Sources";

The presses are a source of sulfur dioxide which discharge through a vent and therefore are subject to 2D .0516(a). Allowable emissions of sulfur dioxide from the sources shall not exceed 2.3 pounds per million Btu heat input. Since natural gas is the only fuel combusted at the sources, it is very unlikely that the emissions of sulfur dioxide from these sources will exceed the allowable limits. Thus, these sources will always be in compliance.

15A NCAC 2D .0521, "Control of Visible Emissions";

Since the presses were constructed after July 1, 1971 they are therefore are subject to 2D .0521(d). Per this regulation, visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period. The applicant shall establish "normal" for the sources in the first 30 days following the effective date of the permit. The latest inspection report not did cite opacity exceedences for these sources.

15A NCAC 2D .0958 "Work Practices for Sources of Volatile Organic Compounds";

These sources will use volatile organic compounds, and since, there is no operational limit on the sources they might have the potential to emit more than 15 lbs of VOCs per day. And thus, it is not exempted from this regulation and will follow the work practices as outlined in this regulation.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS

for Avoidance of 15A NCAC 2D .0530, "Prevention of Significant Deterioration";

The 1st time title V permit (Permit No. 07777T07) issued limited the volatile organic compound (VOC) emissions from the Bielloni flexographic printing press (ID No. FP-1) and the CMF flexographic printing press (ID No. FP-2) to less than 100 tons per year and VOC emissions from the Bielloni printing press (ID No. FP-3B) to less than 250 tons per year.

During the review process for application # 9000159.04A the applicant stated that the volatile organic compound emission from the existing press (FP-3B) was 16.4 and 6.3 tons per year for 2002 and 2003 respectively. Mr. Roger Tisi of this facility did meet with representatives of this Section and also mentioned in a letter that the existing press (FP-3B) was faulty in design and could not keep up to the design production rate. Also, another user

of a similar press has an ongoing lawsuit against the manufacturer because of losses by the use of similar press. The applicant also pleaded it's inability to function under the existing PSD avoidance condition in the permit 07777T07. It was then decided to limit the VOC emissions from all the four presses (ID Nos. FP-1, FP-2, FP-3 and FP-4) to less than 350 tons per year, in order to avoid applicability of this regulation. This decision was based on the fact that DAQ had not met EPA's approval, when during a single revision of their permit while they were classified as synthetic minor (VOC emissions limited to 100 tons per year) DAQ had reclassified this source as a title V facility with two limiting conditions, each of which allowed them a limit of VOC emissions of less than 250 tons per year, to avoid the applicability of this regulation. If the limits were done correctly when the facility went from synthetic minor to title V facility the sources (ID Nos. FP-1, FP-2 and FP-3B) would have had a total emission limit of 250 tons per year of volatile organic compounds. Also, since the technology for the press (ID No. FP-3) was found to have been faulty and the applicant intends to remove this source and replace it with a source both of which have a potential to exceed 250 tons per year, the facility will be limited to less than 350 tons per year of volatile organic compounds. Thus the current permit and the new permit will limit the VOC emissions from the Bielloni flexographic printing press (ID No. FP-1), the CMF flexographic printing press (ID No. FP-2), the Bielloni printing press (ID No. FP-3B) and the Color PCMC Flexographic press (ID No. FP-4) to less than 350 tons per year.

Monitoring and Recordkeeping Requirements

- i) The applicant shall calculate VOC emissions at the end of each month. The calculations and the total amount of VOC emissions must be recorded in a log, and made available to officials of the DAQ.

Reporting Requirements

- ii) The applicant will report semi annually to the Regional Supervisor, Division of Air, the monthly VOC emissions for the previous seventeen months.
- iii) Within 15 days of the start up of the Color PCMC Flexographic press (ID No. FP-4) the applicant shall NOTIFY DAQ the startup date for this source.

STATE-ONLY REQUIREMENT:

15A NCAC 2D .1100: TOXIC AIR POLLUTANT (TAP) EMISSIONS LIMITATION AND REQUIREMENT -

To ensure compliance with the TPERs limit in the permit the applicant shall maintain records of operational information demonstrating that the TAP emissions do not exceed the TPERs.

15A NCAC 2Q. 0317: AVOIDANCE CONDITIONS

for 15A NCAC 2D. 1111: Maximum Achievable Control Technology

In order to avoid applicability Maximum Achievable Control Technology (MACT) regulations, the HAP emissions from the facility are limited to less than 10 tons per year of any HAP and less than 25 tons per year of a combination of HAPs. This will ensure that the facility is minor HAP facility and thus not be subject to any MACT.

Monitoring/Recordkeeping

- i. HAPs emissions per month shall be calculated at the end of each month.
- ii. Total HAPs emissions shall be recorded monthly in a logbook.

Reporting

- iii. The applicant shall make a semi annual summary report of monitoring and recordkeeping activities this report will contain:
- iv. The monthly HAPs emissions for the previous 17 months.

5. NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM

NSPS

The facility is currently not subject to any NSPS requirements.

NESHAP/MACT

This facility is a minor HAP facility and will not be subject to any MACT standards..

PSD

This facility is a major PSD source for VOC emission.

Attainment Status

Currently a section of Union County has a non-attainment status, however, this County is an EAC (Early Action Compact) County and the modification is treated as if the County were in attainment.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM

None of the sources at this facility are controlled, thus, they are not subject to any CAM plans.

6. Facility Wide Air Toxics

This facility has not been triggered for Toxics.

7. Facility Compliance Status

As per the latest inspection report (on IBEAM) dated 12/10/2003, this facility appeared to be in compliance with the applicable air quality regulations.

8. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements.

9. Facility Emissions Review

There is no change in emissions for this renewal since no new sources are being added nor any modification being made to existing sources.

10. IBEAM Changes:

The 1st time title V permit (Permit No. 07777T07) was issued for application # 9000159.02B for this facility on April 6, 2004. The applicant appealed this permit on April 7th, 2004 and was satisfied with the issuance of a .0300 permit (07777R08) for application # 9000159.04A on August 27, 2004. The facility requested the withdrawal of their appeal on June 1, 2004. The application # 9000159.04A shows that the permit issued for this application as (07777T08). This is in error and should be corrected to (07777R08).

11. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V Permit will be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice will be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. South Carolina and Mecklenburg County are the affected programs for this facility.

12. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

Regional Office was provided a draft of this permit and their comments taken into consideration.

Regional Office concurs(?) with RCO recommendation to issue air permit.

Color Ad Packaging Inc - 9000159.04B